

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MORAN FOODS, LLC)	
D/B/A SAVE-A-LOT, LTD.)	
)	Case No. 24-cv-01514-JAR
<i>Plaintiff,</i>)	
)	
v.)	
)	
JOHN DOE,)	
)	
<i>Defendant.</i>)	

PLAINTIFF’S *EX PARTE* MOTION FOR LEAVE TO FILE
SCHEDULE TO CORPORATE DISCLOSURE STATEMENT UNDER SEAL

Pursuant to E.D. Mo. Local Rules 2.09 and 13.05(A)(4), Plaintiff Moran Foods, LLC d/b/a Save-A-Lot, Ltd. (“**Plaintiff**”) hereby moves for leave to file under seal Schedule A to its Corporate Disclosure Statement (“**Schedule**”) and the accompanying memorandum of law submitted in support of this motion. The Schedule includes the names of the members and owners of passive investors in Plaintiff’s business (“**Non-Party Investors**”), and therefore includes personal and private investment information. Moreover, given the nature of this case, the public disclosure of the Non-Party Investors may subject them, or Plaintiff, to further harassment by Defendant.

Plaintiff therefore respectfully requests that the Court permit the sealing of the Schedule and direct the Clerk of the Court to seal the Schedule indefinitely. Plaintiff is filing a public copy of its Corporate Disclosure Statement with the Schedule redacted, consistent with Local Rule 13.05(c).

Signature Page Follows

Dated: December 9, 2024

Respectfully Submitted,

/s/ Karen E. Vaysman

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- and -

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